

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 1:04-cr-10384-1

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UNITED STATES OF AMERICA)
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V.)
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DANIEL KAMEN)
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_____)

**DEFENDANT'S MOTION TO
CONTINUE STATUS CONFERENCE**

The Defendant Daniel Kamen, by and through undersigned counsel, respectfully requests this Honorable Court continue the date of the currently scheduled status conference from Thursday, April 28, 2005 to Tuesday, May 31, 2005 at 2 p.m.

As grounds therefore, the Defendant requests more time to assemble a comprehensive series of evidentiary and discovery motions concerning this relatively new law.

The Government expressly assents to this motion.

The parties agree to exclude the time from 4/28/2005 to May 31, 2005. The Defendant has been consulted by his Counsel and is agreeable to the exclusion of said time period. The Defendant expressly waives any and all speedy trial rights, pursuant to 18 U.S.C. sec. 3161.

WHEREFORE, the Defendant respectfully requests this Honorable Court grant the within Motion.

Respectfully submitted,
Daniel Kamen
By his attorney

/s/ Peter Elikann
Peter T. Elikann
Attorney at Law
93 Beacon Street
Boston, Ma. 02108
617/742-9462

CERTIFICATE OF SERVICE

I, Peter T. Elikann, counsel for the Defendant Daniel Kamen, hereby certify that I have served this Motion upon the Government by delivering a true and exact copy to its counsel, Dena Sacco, Assistant United States Attorney, United States Courthouse, One Courthouse Way, Suite 9200, Boston, Ma. 02210.

Dated: April 26, 2005

/s/ Peter Elikann
Peter T. Elikann